

Re: Question on permit 123A

Ray Leissner to: John Caudle Cc: Philip Dellinger, Stacey Dwyer 08/31/2012 09:10 AM

From:

Ray Leissner/R6/USEPA/US

To:

"John Caudle" <john.caudle@rrc.state.tx.us>

Cc:

Philip Dellinger/R6/USEPA/US@EPA, Stacey Dwyer/R6/USEPA/US@EPA

Hi John,

I forgot to attach the example.

Here's the example attachment to my email below. It contains the inspection report which refers to down hole cement records.



Ray Leissner, Env. Eng. Ground Water / UIC Section (6WQ-SG) (214) 665 - 7183 USEPA, Region 6

The FIRST STEP in protecting your ground water is to have your well tested.

Ray Leissner

John, Thank you for your previous assistance re...

08/31/2012 08:30:07 AM

From:

Ray Leissner/R6/USEPA/US

To:

"John Caudle" <john.caudle@rrc.state.tx.us>

Cc:

Stacey Dwyer/R6/USEPA/US@EPA, Philip Dellinger/R6/USEPA/US@EPA

Date: Subject: 08/31/2012 08:30 AM Question on permit 123A

John,

Thank you for your previous assistance regarding the plugging affidavits at Goliad. In an effort to support UEC's contention of hydraulic isolation between the sands at Goliad, UEC has provided numerous RRC inspection reports (example attached) confirming the tops of the surface plug on many many wells. There are numerous references to, and confirmation of, surface cement plugs but nothing to indicate or show cement down hole. In one report, the inspector referenced cement records to allay the fears of a concerned citizen. The narrative implied these records indicated cement down hole on the two wells of concern. If such records exists, does the RRC collect these records or are they held by the company? Cement or not, in order to judge isolation I need to acquire evidence of what is down hole in these exploratory wells.

Thanks.

Ray Leissner, Env. Eng. Ground Water / UIC Section (6WQ-SG) (214) 665 - 7183 USEPA, Region 6

The FIRST STEP in protecting your ground water is to have your well tested.

Taken from the file: Permit No. 123 May 17-March OS Targer Biono politica 79-87

MICHAEL L. WILLIAMS, CHAIRMAN VICTOR G. CARRILLO, COMMISSIONER ELIZABETH A. JONES, COMMISSIONER



MELVIN B. HODGKISS, P.E., DIRECTOR

RAILROAD COMMISSION OF TEXAS SURFACE MINING AND RECLAMATION DIVISION

March 26, 2008

Mr. Josh Leftwich Environmental Manager Uranium Energy Corporation (UEC) 400 Mann Street, Suite 900 Corpus Christi, Texas 78401

RE:

Weesatche Project, Goliad County Uranium Exploration Permit No. 123A Inspection Report

Dear Mr. Leftwich:

Enclosed is a copy of the report for the inspection completed on March 19, 2008, at UEC's Weesatche Project, Goliad County.

If you have any questions, please contact me at (512) 305-8813.

Sincerely.

Mark Schlimgen, Manager Inspection and Enforcement

MS/sdj Enclosure



RAILROAD COMMISSION OF TEXAS SURFACE MINING AND RECLAMATION DIVISION

URANIUM EXPLORATION INSPECTION REPORT

Project Name:	Weesatche			Pen	nit Number: 1	23A
Permittee:	UEC		•	County: Goliad		
Industry Repres	sentative(s) Present:	John Pollock		•		
Inspector:	Steve Meadows			Date of Inspection	n: March 19, 2	008
		•				
. Field Cond	itions and Data Co	llection	Anther senting the sent of the			
Samples Collec	ted: No 🔯 Y	es 🗌	Sample Type:	Water 🗌	Soil 🗌	Vegetation [
Average Temperature	Soil 65 Condit		Date Last Rainfall	March 18, 2008	Wind Direction/ Velocity (Est.)	North at 1
Photographs At	tached: No 🔲 Yes	(Complete	Section IV)			
I. Enforceme	nt Action Taken					
Notice of Violat	tion Issued:	No 🔯	Yes 🔲	NOV No.		
Cessation Order	Issued:	No 🛭	Yes 🗌	CO No.		
V ,	Hous Meador	US 03/25/2	008	Pula Sh	shi co.	3-25
Inspector Si		Date		lewing Supervisor	Signature	Date

The Railroad Commission of Texas compiles with Federal and State laws applicable to roce, religion, national origin, sex, and disability. Information is available upon request by calling (512) 463-7288 or 1-800-735-7989 if special assistance is required.

Project Name: Permit Number: Weesatche

123A

Inspection Date:

March 19. 2008

III. Comments - Inspection Narrative

· Document the area of the permit inspected

· Discuss observations made during the inspection

Document the results of any field tests taken

Provide a summary of any discussions with industry representatives, along with results, and expectations from those discussions

Describe any enforcement action taken during the inspection, along with facts or evidence supporting the enforcement action

Rain the previous day in the Permit 123 area somewhat curtailed access to certain portions of UEC's activities. 40 exploration boreholes located on the Karnei property will need to be inspected in the future as the landowner requested that road travel be avoided on his property during muddy conditions. Plugging and site restoration for 16 boreholes located near the two old un-occupied Braquet house's was completed and the sites inspected. Photo's 1-6 documents the typical quality of site restoration on the acreage near the old houses. The area past the fence line in Photo 3 is the previously inspected portion of the Braquet property where little evidence can be seen of the several dozen restored borehole drill sites located there. I also inspected the site restoration in progress for several borehole sites located in the field visible in the background of Photos 5-6, through which it was necessary to travel to access the Braquet house location. Further surface restoration remains to be done on these sites that will be reported in a future inspection. The coordinates of the 16 boreholes for which surface restoration was complete are given in the table below.

By email dated March 17, 2008, Ms. Margaret Rutherford requested an investigation of 2 exploration boreholes located adjacent to her property, reportedly approximately 300 feet from each of her 2 water wells that supply her drinking water. I found boreholes P1-07-1-20 and P1-07-JN18 located on the Jacobs property at coordinates N382,796.83-E2,533620.36 and N383,190.69-E2,533,614.74 respectively. During the inspection, I attempted to contact Ms. Rutherford, by telephone and in person, for permission to enter her property and collect a GPS coordinate of her water wells. Unable to access the Rutherford property, I collected a GPS coordinate at the Rutherford property line on Bluntzer Road, and determined borehole P1-07-1-20 to be approximately 374 feet from the property line and borehole P1-07-I-JN18 located at a distance of 246 feet. According to UEC records, drilling and logging of borehole P1-07-1-20 was completed on February 20, 2008 after which the borehole was plugged from a total depth of 500 feet with a slurry of 44 sacks of cement, 50 pounds gel and 9.2 bbls of water. Photo 7 documents a 10-foot metal probe sitting on top of the cement plug. Drilling and logging of borehole P1-07-JN18 was completed on February 26, 2008 and the hole plugged from a total depth of 480 feet with 42 sacks of cement, 50 pounds of gel and 8.83 bbls of water the same day. Borehole P1-07-JN18 is seen in Photo 8 also with the 10-foot metal probe sitting on top of the cement plug. Final topping off and surveying of the borehole plug to complete site restoration was not yet complete at either site although the mud pits were backfilled. I found the surface restoration at both sites to be in good order with all cuttings and drilling mud properly disposed of. The plugging and site restoration procedures followed for these boreholes is consistent with the requirements of the regulations and Permit No. 123A.

Ms. Rutherford returned my telephone call later that day, at which time I informed her of my findings. She related to me that she was unaware of the standard procedure of plugging exploration boreholes with cement from total depth to the surface and remarked that the information was interesting.

Project Name:
Permit Number:
Inspection Date:

Weesatche 123A March 19, 2008

III. Comments -- Cont.

notani		
N196	2,497,095.94	13,500,941.94
N256	2,496,678.43	13,501,317.83
N257	2,496,561.82	13,501,103.81
N258	2,496,675.72	13,500,977.95
N259	2,496,809.06	13,500,941.41
N260	2,496,943.37	13,500,934.80
N261	2,496,622.19	13,501,062.85
N262	2,496,691.92	13,501,050.62
N296	2,496,982.04	13,501,105.10
N297	2,497,006.66	13,501,293.18
N298	2,496,880.22	13,501,300.27
N301	2,497,104.50	13,501,297.26
N302	2,496,801.13	13,501,000.71
N303	2,496,858.40	13,500,945.69
N304	2,496,753.79	13,500,946.73
N299	2,496,901.10	13,501,191.73